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Attorneys for Defendant,
SEAGATE TECHNOLOGY LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**IN RE SEAGATE TECHNOLOGY LLC
LITIGATION**

Case No. 3:16-cv-00523-JCS

CONSOLIDATED ACTION

**JOINT STIPULATION AND [PROPOSED]
ORDER TO CONTINUE THE MARCH 1,
2019 CASE MANAGEMENT
CONFERENCE AND EXTEND THE
DEADLINE TO FILE A JOINT CASE
MANAGEMENT STATEMENT**

This Joint Stipulation is made by and between Plaintiffs and Seagate Technology LLC (“Seagate,” and together with Plaintiffs, the “Parties”), by and through their respective undersigned counsel of record, with reference to the following facts:

RECITALS

1. WHEREAS, Plaintiffs filed a renewed motion for class certification (“Motion”) on October 15, 2018 (Dkt. 189);

5 2. WHEREAS, the Court denied Plaintiffs' Motion on January 22, 2019 (Dkt. 200);

6 3. WHEREAS, the Court instructed the parties “to meet and confer regarding a plan to
7 resolve or try Plaintiffs’ individual claims.”

8 4. WHEREAS the Court ordered the parties to file a joint case management statement
9 ("Joint CMC Statement") no later than February 22, 2019 (*id.*);

10 5. WHEREAS, the Court further ordered that a case management conference
11 ("CMC") be held on March 1, 2019 at 2:00 pm (*id.*);

12 6. WHEREAS, the parties have arranged to meet and confer on February 28, 2019
13 regarding potential resolution of Plaintiffs' individual claims, and therefore require additional time
14 to prepare and submit the Joint CMC Statement and prepare for the CMC;

15 7. WHEREAS, the Parties have agreed, subject to the Court's approval and
16 availability, that the CMC be continued until March 15, 2019, or the earliest available date
17 thereafter; and

18 8. WHEREAS, the Parties have agreed, subject to the Court's approval, that the
19 deadline to file the Joint CMC Statement be extended until March 8, 2019.

STIPULATION

22 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND
23 BETWEEN THE PARTIES that, subject to the Court's approval and availability:

24 (1) the Case Management Conference presently calendared for March 1, 2019 at 2:00 pm
25 be continued until March 15, 2019 at 2:00 pm; and

26 (2) the deadline for the parties to file a joint case management statement be extended until
27 March 8, 2019.

1
2 Dated: February 21, 2019 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
3

4 By _____ /s/ Neil A.F. Popović
5 NEIL A.F. POPOVIĆ
6

7 Attorneys for Defendant
8 SEAGATE TECHNOLOGY LLC
9

10 I, Neil A.F. Popović, whose user ID and password are used to efile this document, hereby attests
11 that, pursuant to Local Rule 5.1(i)(3), concurrence in this filing was obtained from each of the
12 other Signatories, in lieu of each's signature.
13

14 Dated: February 21, 2019 HAGENS BERMAN SOBOL SHAPIRO LLP
15

16 By _____ /s/
17 STEVE W. BERMAN
18

19 Attorneys for Plaintiffs
20

21 Dated: February 21, 2019 AXLER GOLDICH LLC
22

23 By _____ /s/
24 MARC A. GOLDICH (*Pro Hac Vice*)
25

26 Attorneys for Plaintiffs
27

28 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**
29

30 Dated:

31 _____ The Honorable Joseph C., Spero
32 Chief Magistrate Judge
33